

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JEANETTE GOODMAN §
INDIVIDUALLY AND AS §
ADMINISTRATRIX OF THE §
ESTATE OF MICHAEL W. §
GOODMAN, DECEASED §
Plaintiff, §
§
versus §
§
DEPUTY CONSTABLE TERRY §
ASHABRANNER §
Defendant. §

CIVIL ACTION NO. H-03-4198

SPECIAL VERDICT FORM

QUESTION NO. 1

Do you find by a preponderance of the evidence that Defendant Deputy Constable Terry Ashabanner's use of force was clearly excessive to the need and was objectively unreasonable?

Yes
Answer "Yes" or "No"

If you have answered "No", do not answer any more questions. Please sign and date the Certificate and return it to the Court.

However, if you have answered "Yes," please answer Question No. 2.

QUESTION NO. 2

What sum of money, if any, do you find from a preponderance of the evidence should be awarded to Plaintiff as compensatory damages for Deputy Ashabanner's use of force against Michael Goodman?

Consider each element separately. Do not include damages for one element in another element. Answer in dollars and cents, if any.

Estate of Michael Goodman

Pain and Suffering and Mental Anguish:

250,000⁰⁰
4,000⁰⁰

Funeral Expenses:

Jeanette Goodman, Individually

Loss of Companionship and Mental Anguish in the Past:

500,000⁰⁰
1,246,000⁰⁰

Loss of Companionship and Mental Anguish in the Future:

Please proceed to Question No. 3.

QUESTION NO. 3

Do you find from a preponderance of the evidence that Deputy Ashabanner acted with malice or willfulness or with callous and reckless indifference to the safety or rights of Michael Goodman in his use of force against Michael Goodman?

Yes
Answer "Yes" or "No"

If you have answered "No", do not answer any more questions. Please sign and date the Certificate and return it to the Court.

However, if you have answered "Yes," please answer Question No. 4.

QUESTION NO. 4

What sum of money, if any, do you find from a preponderance of the evidence should be awarded to Plaintiff as punitive damages for Deputy Ashabrunner's use of force on the Deceased Michael Goodman?

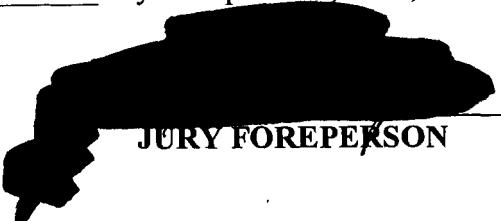
Answer in dollars and cents, if any:

3,000,000⁰⁰

CERTIFICATE

We the jury, have made the above findings as indicated, and herewith return same into Court as our verdict.

SIGNED this the 28 day of September, 2007, at Houston, Texas.

 **JURY FOREPERSON**